

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - : **SEALED SUPERSEDING**
RYAN HULT, : **INFORMATION**
Defendant. : S10 17 Cr. 243 (SHS)
:
- - - - - X

COUNT ONE
(Conspiracy to Commit Wire Fraud)

The United States Attorney charges:

1. From at least in or about 2005 up to and including at least in or about January 2019, in the Southern District of New York and elsewhere, RYAN HULT, the defendant, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and object of the conspiracy that RYAN HULT, the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose

of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

COUNT TWO
(Aggravated Identity Theft)

The United States Attorney further charges:

3. From at least in or about 2005 up to and including at least in or about January 2019, in the Southern District of New York and elsewhere, RYAN HULT, the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, HULT used and transferred names, bank routing and account numbers, and credit card numbers of individual victims in furtherance of the wire fraud conspiracy charged in Count One of this Superseding Information.

(Title 18, United States Code, Sections 1028A(a) (1), 1028A(b), and 2.)

COUNT THREE
(Conspiracy to Commit Money Laundering)

The United States Attorney further charges:

4. From at least in or about 2005 up to and including at least in or about January 2019, in the Southern District of New York and elsewhere, RYAN HULT, the defendant, and others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United

States Code, Sections 1956(a)(1)(B)(i) and 1957(a).

5. It was a part and an object of the conspiracy that RYAN HULT, the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, cash transactions and wire transfers, represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, wire fraud, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

6. It was a further part and an object of the conspiracy that RYAN HULT, the defendant, and others known and unknown, within the United States, in an offense involving and affecting interstate and foreign commerce, knowingly would and did engage and attempt to engage in monetary transactions in criminally derived property of a value greater than \$10,000 that was derived from specified unlawful activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1957(a).

(Title 18, United States Code, Section 1956(h).)

COUNT FOUR
(Conspiracy to Bribe a Public Official)

The United States Attorney further charges:

7. From at least in or about March 2017 up to and including at least in or about July 2017, in the Southern District of New York and elsewhere, RYAN HULT, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, paying a bribe to a public official, in violation of Title 18, United States Code, Section 201(b)(1).

8. It was a part and an object of the conspiracy that RYAN HULT, the defendant, and others known and unknown, would and did, directly and indirectly, corruptly give, offer, and promise a thing of value to a public official, with intent to influence an official act and to induce such public official to do and omit to do an act in violation of the lawful duty of such official, to wit, HULT and others paid an individual ("Individual-1") whom HULT believed to be acting on behalf of a federal law enforcement agent (the "Agent") in order to induce the Agent not to investigate and/or arrest HULT, in violation of Title 18, United States Code, Sections 201(b)(1)(A) and 201(b)(1)(C).

Overt Acts

9. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. A co-conspirator not named as a defendant herein ("CC-1") transported gold bars to RYAN HULT, the defendant, for HULT to exchange for cash in order to pay the Agent.

b. HULT paid Individual-1 a sum of currency to ensure the Agent did not arrest HULT or CC-1.

(Title 18, United States Code, Section 371.)

COUNT FIVE
(False Statements)

The United States Attorney further charges:

10. In or about 2015, in the Southern District of New York and elsewhere, RYAN HULT, the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation, to wit, HULT made false statements in a financial disclosure document submitted to the Federal Trade Commission (the "FTC") in connection with the FTC's investigation into HULT and his businesses.

(Title 18, United States Code, Sections 1001 and 2.)

FORFEITURE ALLEGATION

11. As a result of committing the offense alleged in Count One of this Superseding Information, RYAN HULT, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

12. As a result of committing the offense alleged in Count Three of this Superseding Information, RYAN HULT, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

SUBSTITUTE ASSET PROVISION

13. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28 United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 982; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



GEOFFREY S. BERMAN AKA
United States Attorney

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SEALED SUPERSEDING INFORMATION

S10 17 Cr. 243 (SHS)

(18 U.S.C. §§ 371, 1001, 1028A, 1349, 1956,
and 2)

GEOFFREY S. BERMAN
United States Attorney.
